

Justification for:

1. Equivalent Level of Safety:

- STC data storage of "compliance records" at a DAS facility versus an FAA facility provides an equivalent means of compliance with the intent of 14 CFR §21.463(b).
- If the data is stored and maintained at the DAS facility, it remains classified as "FAA compliance records". The DAS is assigned with controlled access equivalent to that currently provided by the FAA according to a Memorandum of Agreement (MOA) signed by the cognizant ACO and DAS organization.
- This means of storage and retention of compliance data, affords expedient access when maintained by the DAS.
- In accordance with the paperwork reduction act an "equivalent level of safety" is provided with the ease of access and data utility provided by DAS storage of "compliance records". The paperwork reduction act states: "Ensure the greatest possible public benefit from and maximize the utility of information created, collected, maintained, used, shared and disseminated by or for the Federal Government."

2. In the public interest:

- Government resources utilized to maintain and store the "compliance records" and data are significantly reduced providing government man-hours that can be redirected toward safety related issues.
- Cost of government warehouse space and maintenance of STC data packages (compliance records) become the responsibility of the DAS organization financially supported by industry not government.
- FAA resources could be better utilized within the FAA's Customer Service Initiative, addressing customer related issues.
- By compliance with the paperwork reduction act that states: "Coordinate, integrate, and to the extent practicable and appropriate, make uniform Federal information resources management policies and practices as a means to improve the productivity, efficiency, and effectiveness of Government programs, including the reduction of information collection burdens on the public and the improvement of service delivery to the public"